

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HUDSON PRIVATE LP and HUDSON PRIVATE :  
CORP., :  
Plaintiffs, : Case No. 7:21-cv-08259-CS  
v. :  
: NOTICE OF  
: JOINT MOTION TO DISMISS  
BRON STUDIOS USA, INC., BRON CREATIVE :  
USA, CORP., CREATIVE WEALTH MEDIA :  
FINANCE CORP., and JASON CLOTH, :  
Defendants. :  
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**PLEASE TAKE NOTICE** that, upon the declaration of William R. Fried, Esq., dated September 30, 2022, and the exhibit annexed thereto, the declaration of Jason Cloth, sworn to on September 30, 2022, and the exhibit annexed thereto, and the accompanying joint memorandum of law, Defendants BRON Studios USA, Inc. (“BRON Studios USA”), Bron Creative USA, Inc. (“Bron Creative USA”), Creative Wealth Media Finance Corp. (“Creative Wealth”) and Jason Cloth (“Cloth” and collectively, “Defendants”) will respectfully move before the Honorable Cathy Seibel at the United States Courthouse for the Southern District of New York, located at 300 Quarropas Street, Courtroom 621, White Plains, NY 10601, on a date and a time to be determined by the Court, with opposition and reply papers to be served and filed in accordance with the Court’s Order dated June 10, 2021 (Doc. No. 41), for an Order: (i) dismissing the Amended Complaint in its entirety as against BRON Studios USA pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6); (ii) dismissing the Amended Complaint in its entirety as against Cloth pursuant to Fed. R. Civ. P.

12(b)(6); and (iii) dismissing the Amended Complaint's second, fifth, eighth and eleventh causes of action as against Bron Creative USA and Creative Wealth pursuant to Fed. R. Civ. P. 12(b)(6).

Dated: New York, New York  
September 30, 2022

BOIES SCHILLER FLEXNER LLP

By: /s/ Joshua I. Schiller

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